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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD W. GIBSON,

Defendant.

NO  
INFORMATION

**CR04 0374RSM**

04-CR-00374-INFO

The United States Attorney charges that:

**COUNT 1**

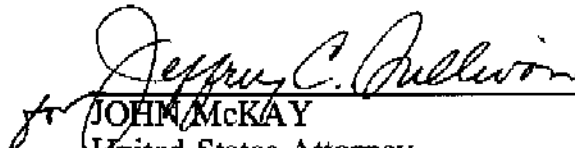
**(Wrongful Disclosure of Individually Identifiable  
Health Information for Economic Gain)**


1. On or about October 17, 2003, at Seattle, within the Western District of Washington, RICHARD W. GIBSON, who was then an employee of a health care provider in Seattle, Washington, knowingly and for a reason other than permitted by Title 42, United States Code, Chapter 7, Subchapter XI, Part C disclosed individually identifiable health information of Patient A, a patient receiving treatment at the health care provider at which RICHARD W. GIBSON was employed, with intent to use that information for personal gain. Specifically, defendant RICHARD W. GIBSON disclosed Patient A's name, date of birth and social security number which had been collected by the health care provider from Patient A and related to the provision of and payment for health care services, to a representative of AT&T Universal Card for RICHARD W.

1 GIBSON's own personal economic gain, that is, for the purpose and intent of obtaining a  
2 credit card in the name of Patient A.

3 All in violation of Title 42, United States Code, Section 1320d-6(a)(3) and  
4 1320d-6(b)(3).

5  
6 DATED this 17<sup>th</sup> day of August, 2004.

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9 JOHN MCKAY  
United States Attorney

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12 FLOYE G. SHORT  
Assistant United States Attorney

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15 SUSAN LOITZ  
Assistant United States Attorney  
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